

BRIAN D. HARRISON (SBN 157123)
SEDGWICK LLP
333 Bush Street, 30th Floor
San Francisco, CA 94101-2834
Telephone: (415) 781-7900
Facsimile: (415) 781-2635
brian.harrison@sedgwicklaw.com

TRACI M. RIBEIRO (*pro hac vice*)
SMITA MOKSHAGUNDAM (*pro hac vice*)
SEDGWICK LLP
One North Wacker Drive, Suite 4200
Chicago, IL 60606-2841
Telephone: (312) 641-9050
Facsimile: (312) 641-9530
traci.ribeiro@sedgwicklaw.com
smita.mokshagundam@sedgwicklaw.com

Attorneys for LEXINGTON INSURANCE
COMPANY and THE INSURANCE COMPANY OF THE
STATE OF PENNSYLVANIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN STEEL & STAIRWAYS, INC.;)
MARTIN VOLLRATH, an individual; and)
THOMAS VOLLRATH, an individual,)

Plaintiffs,)

v.)

LEXINGTON INSURANCE COMPANY, a)
Delaware corporation; INSURANCE)
COMPANY OF THE STATE OF)
PENNSYLVANIA, a Pennsylvania)
corporation; and DOES 1 through 100,)
inclusive,)

Defendants.)

Case No. 12 cv 3103 JST

[The Honorable Jon S. Tigar]

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE DATE OF
INITIAL CASE MANAGEMENT
CONFERENCE**

Pursuant to Civil Local Rules, 16-2(e) and 7-12 for the Northern District of California, Defendants Lexington Insurance Company (“Lexington”) and the Insurance Company of the State of Pennsylvania, (“ISOP”) and Plaintiffs American Steel & Stairways, Inc., Martin Vollrath and Thomas Vollrath (collectively “Plaintiffs”), collectively the “Parties,” by their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, the initial case management conference is currently set for May 29, 2013 at 2:00 p.m.;

WHEREAS, Traci M. Ribeiro, lead counsel for Lexington and ISOP, has a deposition on May 29, 2013 that cannot be re-scheduled;

WHEREAS, counsel for Plaintiffs does not object to re-scheduling the initial case management conference in this case;

WHEREAS, none of the Parties will be prejudiced by an extension of the initial case management conference date;

NOW, THEREFORE, the Parties hereby stipulate to continue the date for the initial case management conference to a date to be scheduled by the Court.

IT IS SO AGREED AND STIPULATED.

DATED: May 20, 2013

SEDGWICK LLP

By: /s/ Traci M. Ribeiro
Traci M. Ribeiro (*pro hac vice*)

Smita Mokshagundam (*pro hac vice*)
One North Wacker Drive, Suite 4200
Chicago, IL 60606
Telephone: 312-641-9050
Facsimile: 312-641-9530

Attorneys for Defendants LEXINGTON
INSURANCE COMPANY, INSURANCE
COMPANY OF THE STATE OF
PENNSYLVANIA

WILLOUGHBY, STUART & BENING

By: /s/ Alexander F. Stuart
Alexander F. Stuart

50 W. San Fernando Street, Suite 400
San Jose, CA 95113
Telephone: 408-289-1972
Facsimile: 408-295-6375

Attorneys for Plaintiffs AMERICAN STEEL
& STAIRWAYS, INC., MARTIN
VOLLRATH and THOMAS VOLLRATH

1 PURSUANT TO STIPULATION, IT IS SO ORDERED that the Initial Case Management
2 Conference is continued to June 5, 2013, at 2:00 p.m.;

3
4 DATED: May 22, 2013


HONORABLE JON S. TIGAR
UNITED STATES DISTRICT COURT JUDGE